

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

<p>IVETTE M. MARTINEZ GONZALEZ Plaintiffs</p> <p>v. CATHOLIC SCHOOL Defendants</p> <p><i>Consolidated with:</i></p> <p>NORMA CARDOZA ESTREMER and CANDIDA PEREZ ROBLES, on their behalf and on behalf of all the participants of the Pension Plan for the Employees of the Catholic School of the Archdiocese of San Juan</p> <p>Plaintiffs</p> <p>v. COLEGIO PADRE BERRIOS, ACADEMIA SAN JOSE, PENSION PLAN FOR CATHOLIC SCHOOL OF THE ARCHDIOCESE OF SAN JUAN, BOARD OF TRUSTEES, et. Al.</p> <p>Defendants</p>	<p>Case Civil No. 16-2077</p> <p>Case Civil No. 16-2318</p> <p>COMPLAINT: ERISA § 502 Treas. Reg. § 1.401(a)-50 Tittle II of ERISA IRC 501(a), 414(e), 410(d) US Common law PRIRC 2011</p>
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**MOTION FOR EXTENTION OF TIME TO FILE DECLARATIONS
AND FOR LEAVE TO FILE DOCUMENTS IN THE SPANISH**

TO THE HONORABLE COURT:

COMED NOW Plaintiffs, through the undersigned attorney and respectfully allege and
pray as follow:

1. In this same date, the appearing party is filing a motion requesting that a partial
summary judgment be rendered on its behalf grounded on the ERISA application to this case.

2. Some of the documents, in which the appearing plaintiffs are sustaining their motion are in Spanish; the Summary Plan Descriptions for the Plan dated 1979 and 1993 and the certification of Mrs. Candida Perez's salaries while employed with Defendant Colegio Padre Berrios prepared by the Archdiocese.

3. The appearing party respectfully request from this Honorable Court leave to file three (3) exhibits attached to the motion in the Spanish language, until a certified translation is obtained and filed within a reasonable period to be granted by the Court, not less than 90 days, until March 20, 2018.

3. Also to grant Plaintiffs ten (10) days to submit the declaration of Plaintiffs; as Exhibit 7 and 8 to the Motion for Partial Summary Judgment.

IN WITNESS WHEREOF, the appearing plaintiffs respectfully request that this motion be granted.

RESPECTFULLY SUBMITTED.

HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

In San Juan, Puerto Rico, this 20th day of December , 2017.

s/Luis Vivaldi Oliver
Luis Vivaldi Oliver
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